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ABSTRACT

The new NIE (National Institute of Education) projects, Compensatory Education Study (Hill et al., 1976, 1977a, 1977b) and the Vocational Education Study (David et al., 1978), along with an earlier Safe Schools Study, are being considered in the evaluation community as possible new paradigms for research. Results of previous evaluation studies reveal several problems, among which were overly technical findings, reports arriving too early or too late, poorly designed evaluations, data requested only to bolster previous positions, etc. Characteristics for the new evaluations involve direct routes to Congress, considerable time allocation, and absence of constraints in the legislation on the design, measures, or analysis. Despite the improvements in the approach to evaluation, several problems are still encountered: (1) Congress often indirectly affects the evaluation paradigm when committee memberships change, resulting in a lack of knowledge concerning the design of a project and its purpose; (2) although an agency chosen to handle mandated studies needs to be able to quickly hire and fire personnel to procure talent for short periods and to quickly contract work, staffs to manage projects must be accommodated within agency ceilings, job expenditures must be negotiated with Congress, and inhibiting civil service procedure must be followed; (3) difficulty is encountered by evaluation teams who must effect communication with diverse groups within an organization; and (4) mandated studies cannot conflict. Though there is little research on mandated studies, it is concluded that evaluation cannot evolve quickly and adaptations must be made while the evaluation is in progress. (VB)

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THE NEW CONGRESSIONALLY MANDATED STUDIES: NOTES TOWARD SPECIES IDENTIFICATION

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Between 1972 and 1976, Congress asked the National Institute of Education (NIE) to conduct two evaluation research projects. These are the Compensatory Education Study (Hill et al., 1976, 1977a, 1977b) and the Vocational Education Study (David et al., 1978). The Safe Schools Study (Boesel et al., 1978) was mandated as the responsibility of the Secretary of Health, Education and Welfare and assigned first to the National Center for Educational Statistics; in 1975, the study was transferred to the Institute for design and management. The purpose of this paper is to share something of what has been learned about this form of evaluation in the past few years, a report something akin to an early description of what may (or may not) be a new species.

Congressionally mandated studies are nothing new. For many years, Congress has asked for research from diverse agencies, three of which report exclusively to Congress (Beckman, 1976). Since 1946, the Congressional Research Service of the Library of Congress (CRS) has answered Congressional requests for knowledge syntheses and analyses. The General Accounting Office (GAO) provides Congress with substantive audits of program administration, management and effectiveness as well as reports on fiscal accountability. GAO's stature as a tough-minded, independent agency is bolstered by appointment of its director for a 16 year term. While many GAO studies in education have relied on secondary sources such as annual state reports, GAO increasingly is collecting its own first-hand information and verifying the evaluation reports of others through such devices as secondary analyses and re-interviewing participants (Marvin et al., 1977). The CRS and GAO were joined in 1974 by the Congressional Budget Office. In a very short time, the new Office has proven to have formidable capabilities in educational policy studies as well as analyses in related fields.

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In addition to these three agencies reporting only to Congress, the Legislative Branch has turned often to the Executive Branch agencies and to independent groups such as the National Academy of Science for evaluative and policy research. In almost all educational legislation, Congress has directed the Executive Branch to collect data for Congressional use. While many Congressional directives in educational evaluation are intended to improve program management, the precedent for expecting other information more attuned to Congressional needs goes back to the Act authorizing a Department of Education in 1874 (Cronbach and Suppes, 1968). As an example in vocational education legislation, the 1963 Act required appointment of a 1966 national commission to report on the implementation of the 1963 law prior to the re-authorization expected in 1968 (Datta, 1978).

Despite a very long list of prior Congressionally mandated studies, the new NIE studies are attracting some attention in the evaluation community as a possible new paradigm for research. The interest is understandable. Not only has the Compensatory Education Study already featured prominently in re-authorization testimony (Hearings, 1978), but in a young field, models are a useful way of organizing theory and practice. Already in evaluation research, much interest has centered on the distinction between summative and formative evaluation, on planned variations, on the local problem solving model, on adversary evaluation, and on approaches such as CIP and MAUT. Theoretical discussion and early enthusiasm, however, have somewhat outpaced field experiences with these models. Where models are applied in situations later experience shows were inappropriate, premature pessimism about the model and evaluation can replace premature optimism. Planned variation is a case in point; despite the effort to learn from the Follow Through experience (Rivlin and Timpane, 1976),there have been no planned variation evaluations begun since 1972.

Habitat

Before turning to the features of this possible new model which may help predict where it may be appropriately used, a bit about its natural habitat may be helpful. All three studies appeared at a time when early rumblings about the failure to act on the findings of evaluation research (see, for example, Suchman, 1966, and Wholey et al., 1968) reached earthquake proportions. These alleged failures have led some to the safer ground of not expecting much direct guidance for policy-makers from social research (for example, Cohen and Garet, 1975). Others have examined the political milieu in which evaluation

research has occurred, turning to studies of the utilization processes under varied conditions (for example, Weiss, 1972 and Havelock, 1975). Still others have tried harder with various technical remedies for increasing the utility and the utilization of evaluations (for example, Rivlin and Timpane, 1976; General Accounting Office, 1977). A robust new discipline is emerging from these efforts with models, theories and projects of its own: the field of knowledge production and utilization.

Leaving aside the question of whether non-utilization is so universally the case (and I do not think it is), a number of problems have been fingered as the culprit. The charges include:

- o findings have been reported in too technical manner
- o the content and focus of the studies are unresponsive to the needs of policy-makers: the wrong questions are being asked
- o release of reports and times of decision are out of synchrony; reports are too early or too late
- o the evaluations have been poorly designed and the measures have been inappropriate or insensitive
- o evaluators have not had enough time, money or authority to carry out the studies properly; the techniques are adequate but the conditions for using these techniques have been wanting
- o report quality has been attentuated by insufficient negotiations with too few layers of power
- o report quality has been attentuated by too much negotiation with too many layers of power
- o the evaluation paradigms have been appropriate for go/no go decisions rather than the more modest, marginal changes in characteristics of our system
- o policy-makers don't want the data, except to bolster selectively their pre-conceived and immovable positions on issues

The new Congressionally mandated studies differ from other requests in ways related to these diagnoses. While other studies may share some of their characteristics, the new studies have them all, albeit in varying degrees.

- the timing of the studies is specified in the law to be compatible with the needs of Congress

- the studies require prior approval by Congress of a plan of research, in which the mandate in the legislation undergoes a first transformation to a series of research questions

- research project designs and measures evolve through negotiations with Congress. The negotiations and discussions continue throughout the course of the research in something of an architect-client relationship, with the client observing the building taking form as the research findings come in

- the client is unequivocally Congress. While many other groups may be asked for advice in the course of the study, Congress is the client the NIE staff and consultants are serving

- the studies have direct routes to Congress without prior reviews by any external group or member of the Executive Branch

- funds are provided directly in the legislation for these studies so they do not have to compete for money with other Executive Branch interests

- the studies have considerable time (from one reauthorization to the next, a three to five year period), and thus have a running start on adequate measurement, design, field work and analysis

- there are no constraints in the legislation on the design, measures or analysis. Technically, only the state of the art and and ability of the researchers should limit the quality of the work

- several related studies together form a plan of evaluative research. A mix of large and of small studies, of surveys, policy analyses, experiments, case studies, cost assessments, process and outcome evaluations can converge on questions of Congressional interest. The product is information answering these questions, brought together from a variety of sources.

- o the studies are given specific authority to experiment with approaches to eligibility and allocation formulae and other requirements of the law which are otherwise prohibited

- o Congress specifies fairly precisely in the legislation the questions it wants answered. Meetings with the legislators and their staffs, reports of discussions during the hearings, and examination of the testimony of witnesses are also available. These help the evaluators understand the purposes of the law and why the questions were important enough to require a specially mandated study.

This list of evaluation characteristics perhaps comes as close to heaven as many evaluators have dreamed. There are, it should be noted, variations. Both the Safe Schools Study and the Compensatory Education Study needed extensions of time. There were no formal requirements in the Safe Schools Study for review of plans, although the study was discussed informally and at length with Congressional staff. Safe Schools Study findings were reported to Congress by the Office of the Secretary of Health, Education and Welfare after review, which in this instance was scrupulously apolitical though somewhat slow. Funds for the Safe Schools Study were not provided by Congress and had to be scraped up; the law did require a certain data collection procedure and timeline which proved unworkable; and the study was not given authority for experimentation. The Vocational Education Study, while blessed with all of the features, has not to date involved the close communication with Congress that may have been a pivotal aspect of the Compensatory Education Study.

The studies also vary in their stage of development. The Compensatory Education Study is near completion, although data are still being collected in one project and analyses suggested by Congressional interest in earlier reports are still ongoing. The re-authorization hearings on the Elementary and Secondary Education Act began almost a year ago. They are still in progress, and the eventual impact of the research on legislation is unsure. The immediate impact is observable in the quality of the discussions and testimony in the hearings, and in the extent to which the NIE study findings are cited as credible in informing discussion of the issues. The Safe Schools Study has just released its report. No policy effects are visible as yet, but the findings have received considerable attention in the press. And the Vocational Education Study is just entering the second year of a four year effort.

Comments will have to be based then, on confounding this possible new species with its administration by a single agency, with that agency's turbulent history, with the characteristics of the handful of people who have participated in the studies in the Institute and in Congress, and with the nature of the problems examined and the constituencies involved. With three incomplete specimens, conclusions about the new Congressionally mandated study as a paradigm for improving the utility and utilization of research are premature, but speculation is irresistable.

Some Boundary Conditions

A Good Friend but a Complex Master: Glennan and Berryman (1978) have suggested that the Office of Education focus its evaluation money on the USOE's big budget programs such as student loans, vocational education, and compensatory education, and that all its studies adopt the Congressionally negotiated features of the Compensatory Education study.

One boundary condition on the use of these features is that the many other demands on the time of Congressional staff place a very low upper limit on how many negotiated studies could be handled. As an example, between February 15th and May 15th, the Senate subcommittee responsible for education legislation must report out of Committee fifteen major pieces of educational legislation which are up for re-reauthorization in 1978, in addition to many pieces of new legislation committee members want considered. The House counterpart sub-committee responsible for education legislation has to deal with all of these reauthorizations plus its own slate of new legislation. While authorizations are on a three to five year cycle, the House and Senate appropriations committees operate on a yearly cycle, having to review each year the funds to be allocated for every single piece of educational legislation. The staffs of the committees are dealing on a per person basis with levels of funds which make the rule-of-thumb of evaluation management ($500,000 for one professional) seem indolent luxury. While all Congressional staffs and the legislators themselves have been monumentally generous with their time on the three NIE studies, their time is severely limited. It must be used with a grueling efficiency that probably would rule out many evaluations with involvement as intense as that given to the Compensatory Education study.

Another aspect of Congress affecting mandated or negotiated studies as a model is illustrated by two instances. Between authorization of the Vocational Education Study in 1976 and completion of the study plan in December 1977, Congressional Committee membership changed. It will change at least one more before the study is completed. In the first change, one member who most wanted one of the four sub-studies left the

Committee. The members of Congress to whom the issues were highly important may retain interest if they remain in Congress, but other matters in their new Committee assignments may become more pressing. The study design can not assume that four years later, there will be many people on the subcommittees who remember why the study was so important to begin with or who will welcome the findings.

There are, to be sure, continuities. The Chairmen of a Subcommittee and of a full Committee are by definition senior members of Congress who exercise great leadership within their committees. They are likely to continue to serve in Congress, along with their staffs, long after the study is completed. Representative Carl Perkins, for example, has chaired the House Committee concerned with education for over 15 years. Also, the study questions can be formulated to anticipate the durable issues, avoiding more faddish concerns. As examples, the consequences of changing eligibility or allocation formulae are durable issues. Studying how rapidly the energy industry expands as a result of vocational education energy occupation curriculum development might be of shorter term value.

To a great extent, responsibility for selecting durable issues rests in the Congressional committees writing the legislation mandating the study. Not all members of Congress seem to have a firm grasp on research or how to write legislation permitting an achievable study. Some National Academy of Science staff, for example, recall with awe one Congressionally mandated study which required a comprehensive report on all aspects of all consequences of all uses of all defoliants in Vietnam, to be completed in six months for a total expenditure of $15,000,000. During the planning process, however, there is opportunity to see how well different ways of formulating research questions may meet the needs underlying the language in the legislation and to select the issues of a more durable and do-able nature.

A second instance is the many ways in which the evaluator is reminded of the diversity of Congress. In the Vocational Education study, for example, there is diversity even within the House and the Senate committees responsible for educational legislation on such matters as:

- o the primary purposes of Federal support for vocational education
- o the priorities within the legislation of different goals such as assuring post-program employment in training-related occupations versus serving most economically depressed areas or assuring sex-fairness in all aspects of the program

- the purpose of the NIE study as an independent report to Congress on the responsiveness of the USOE-administered program to the new legislation or as a more futures oriented examination of the relationships between Federal vocational education and other education, and between vocational education and other forms of economic development policies

Congressional diversity also has implications for the study on a more mundane level. As an example, in the draft legislation, research to inform three questions was to receive an authorization of $2 million annually. During the House-Senate conference when the worthwhileness of the study was challenged, a fourth large question was added but the budget was cut in half. While $1 million annually for four years is a substantial sum, the consequences of increasing the assignment by 33% and decreasing the funds by 50% has challenged staff ingenuity. And we are aware that although Congress has backed up its mandated studies, the studies have to walk a line between outraging large, well-organized constituencies that rarely welcome evaluations and assurance that the research will be thorough, objective and "unbought".

Orphans in Bureaucracyville: As one researcher observed,

> "To handle Congressionally mandated studies, an agency needs to operate like a private research firm; able quickly to hire and if need be, to fire, personnel; to bring the talent needed quickly on board for short-term assignments; and to arrange rapidly for contracted work. A kind of orphan status and the glacial procedures for doing anything combine to almost sink the studies".

The Congressionally mandated studies, while bringing much prestige to agencies, are still frozen money which can not be directed to the priorities of agency administrators. Two of the studies have been provided with funds from USOE programs, $5 million annually for three years for the compensatory education projects and $1 million annually for four years for the vocational education study. Although the direct costs of these two studies do not bite into NIE appropriations, agency administrators can not use these monies for projects of special interest to them. And the staff to manage these projects must be accommodated within the agency ceiling, subject to whatever reorganization, freezes or downgrading is currently affecting the agency. The studies create a substantial lien on personnel slots, which can be more valuable than the money itself in times of freezes on hiring or downgrading. Agency leadership may be conceptually supportive of the

studies and honored by Congressional confidence in NIE, but in practical terms, the studies are viewed officially as external to the agency's mission. This view has consequences affecting studies which are legislatively required to meet deadlines and are on a fixed income.

One example is personnel. How many slots and at what levels have to be negotiated with agency leadership, which understandably would prefer to lose as few slots as possible to frozen money studies. Negotiating the vocational education study personnel configuration has taken over a year before the study finally received what we regard as authorization to recruit enough of the right mix of positions to carry out the study. Hiring personnel for these positions is another challenge. The Civil Service procedures require (a) review of the position descriptions prepared by project leadership for consistency with the agency-established organization chart,(b) establishing a grade level consistent with Civil Service regulations, (c) posting these positions, (d) review of the applications by a special panel to select highly qualified, qualified and non-qualified candidates, (e) interviewing candidates and preparing selection recommendations, (f) approval of the recommendations by three echelons, (g) negotiation of salary and other terms of employment with the candidate and (h) arranging for initiation of employment. All steps except (g) are the responsibilities of different functionaries in the Personnel Office, each of whom has many other actions which can take priority unless there is an override. In the case of the Vocational Education study, the Associate Director of the Education and Work Group placed Study personnel actions at the head of all other EWG requests except contract renewals for already hired personnel who would otherwise lose their jobs. As a result, other EWG staff have been carrying responsibility for the work of several unfilled vacancies for two years or longer. Even if all goes well, recruitment requires about ten months between approval of a staffing chart and arrival of the staff member. With only 12 months to prepare a study plan, having to spend the first six months or longer trying to assemble a team can be a Hobson's choice between going ahead with plans the team may later wish to undo or delaying work in the hope the team can do twelve months' work in six months when it finally arrives.

As a second example, awarding a contract requires (a) approval of review panel appointments, (b) preparing the scope of work, (c) approval of the scope of work by the review panel or revisions, (d) approval by the Contracts Office or revisions, (e) announcement in Commerce Business Daily, (f) holding a bidder's conference and mailing out the minutes of the meeting, (g) receiving the proposals, (h) review of

the proposals, (i) negotiations with bidders in the eligible range, (j) receipt of best and final offers, (k) review of best and final offers, (l) preparation of the memo of recommendation, (m) final negotiations and (n) contract award. Only the pace of activities b, h, k, and l can be influenced by project staff. For all the other steps, the Congressionally mandated studies have to netotiate a place in line among many other contract actions trying to get through the narrow contracts funnel. Long as four years may seem, the full year that some contract actions have taken in the past would be too slow to permit meeting Congressional deadlines. In some instances, study directors have had to choose between the hope of later legitimation of work informally initiated or having to request an extension of time from Congress.

As a third example, the Congressionally mandated studies and also funds transferred from other agencies have been declared outside of the agency's mission. A charge is therefore levied on the gross budget to cover telephone charges, equipment, space rental, and other overhead items such as percentage of all costs of contracts and personnel staff. The direct personnel costs of project staff, their travel and consultants also are taken directly out of project funds, although the staff come from regular agency slots. This reduces the $1 million annual appropriation for the vocational education study to $650,000 annually available for all data collection and analysis for all four Congressionally mandated sub-studies. Over 20 projects are required in the plan, yet $650,000 is about the cost of <u>one</u> national evaluation.

There are strongly held views on the reasonableness of these situations. With backlogs in personnel and contracts actions, often resulting from freezes, reorganizations or Civil Service reviews beyond agency control, it is hard to justify penalizing other agency projects because one study has its source in specific Congressional interest. Nor is there justification for starving the agency as a whole for staff and expenses money because one favored study needs S&E, too. But it does create tension when a project is "taxed" for support services which it then receives only slowly and painfully because no new staff are hired in personnel or contracts to provide the support services. On a small scale, these inconveniences can be handled on a case-by-case basis. On a larger scale, viewing Congressionally mandated studies as external to an agency's mission suggests some low upper limits on agency capacity to manage Congressionally required studies while retaining its identity as part of the Executive Branch.

One study manager illustrated this tension:

> "I desperately needed someone to do some multivariate analyses. The Associate Director in July 1976 promised to get us a person for a year. We had a good list of six or seven candidates. Negotiations to get authorization for this one person dragged on through October and November and the candidate kept dribbling away. In January we finally got authorization to hire this one person. We had to hire the last person on the list and he decided at the last minute to take a job elsewhere. It was now February. We finally hired a person in March and we had expected to have someone in November. I wouldn't direct a Congressionally mandated study again unless I could set the personnel authorization up right from the beginning."

A consensus among mandated study directors seems to be that in order to permit agencies to operate more like private research firms, which is needed if the studies are to go well, the legislation authorizing the studies should also authorize (1) additional positions above the agency's present ceiling, (2) funds to cover the cost of staff and expenses as well as the costs of contracted data collection, (3) use of non-standard procedures for hiring and recruiting personnel and (4) use of non-standard procedures for awarding contracts and grants.

Rara Avis, Different Staff: Almost any evaluation team needs to find a path among various groups who wish to protect the program being evaluated and those who want some muckraking, between responsiveness to the needs of various clients and stakeholders and concern for the credibility of the study. The skills required to do so in a Congressionally mandated study are of an order of magnitude different from those of usual evaluations, even national evaluations. Communication between a program staff member of the Executive Branch and Congress, which is most unusual and indeed usually is forbidden, now becomes central. A study director who can not communicate comfortably, freely and collegially with Congressional clients has lost what may be the greatest advantage of the new Congressionally mandated studies. Persons who combine research experience, the bureaucratic and managerial skills required to complete a program of studies, and the superb communication skills needed are difficult to locate. We hope we have put together a team for the vocational education study which can come through, yet we are aware that the Compensatory Education study may have been remarkably blessed in having a full-time, highly experienced Congressional liaison and in the communication skills of its Director.

The requirement for political sensitivity extends to other staff. Many educational researchers seem barely aware of the difference between appropriations and authorizations, do not know when important pieces of legislation in their field are scheduled for re-authorization, and find it difficult to discuss a question such as "What research would be useful for a Congressional committee considering reauthorization of any piece of legislation closest to your interest?" The distance between Congressional concerns and the perspectives even of evaluators in Washington agencies is often leagues-wide.

In addition to communication skills and sensitivity to policy questions, the staff need to be perceived as honest brokers: persons informed about the concerns of various interest groups, who are neither advocates (which would limit their credibility outside of the program being studied) nor adversaries (which would increase the difficulties in conducting the study and limit their credibility within the program being studied). "Who is on your staff" is often the first question we are asked: special interest groups want to see many of their own leading the study while public interest groups want to feel assured the study is not a creature of the special interests...hence, the value of the honest broker.

Centipede Agonistes: The evaluation studies mandated by Congress may not be intended as parts of a whole, but for logistic as well as conceptual reasons, they can not work at cross-purposes. The 1976 vocational education evaluation requirements include (a) the NIE studies, which will investigate four distinct subquestions, (b) the national study mandated by Congress of sex-fairness in vocational education, which is being conducted by the USOE Office of Evaluation and Dissemination, (c) the National Vocational Education Data System which is to provide information on enrollments, completions, staff, facilities, curricula and costs, and which is operated by the National Center for Educational Statistics, as required by Congress, an office reporting to the Assistant Secretary for Education, (d) the in-depth evaluations by USOE of each of the state-level vocational education programs, which are to be conducted at a rate of ten annually, (e) the in-depth evaluations by each state of the vocational education programs and activities within that state, to be conducted at a rate assuring that every program will be reviewed at least once during the five year period, (f) an annual follow-up study of program completers and non-completers to be conducted on a sampling basis by every state for every year, (g) the evaluation of the federal administration of vocational education to be conducted by the National Advisory Council on Vocational Education and (h) the evaluation stuties to be conducted by the new National Center for Research in Vocational Education, funded for five years at $5 million annually.

In addition, the USOE central Office of Evaluation usually conducts other evaluation studies of vocational education; the Bureau responsible for administering the Vocational Education Act has authorization under the 1976 Amendments to expend all of the Federal share of the research monies on contracted activities, which typically are more policy oriented than grants; and the GAO is considering undertaking its own evaluation of the implementation of the 1976 Amendments.

This poses some challenge for coordinating data collection and integrating findings. Suppose for one of the NIE studies, it is important to know the rate of change by gender in enrollments in occupational and non-occupational vocational education programs. One approach is for NIE to design a survey which will answer this question directly. To avoid duplication of effort and unnecessary demands on the schools, we will need to find out (a) if the NVEDS system will have reliable data by no later than January 1981 on a nationally representative basis with the new uniform definitions available for 1977, 1978, 1979 and 1980, (b) whether the sex fairness study will include a large enough sample of enrollments over four years to permit generalizations about occupational and non-occupational enrollments, (c) if data on rate of change will be available on large enough and representative enough samples, with uniform definitions, from the USOE evaluations of the ten states annually or from the state evaluations of the local programs, or (d) if there is another Federally funded evaluation from which the data would be available.

Multiply this one example by scores of data points, and the coordination challenge becomes substantial. The agencies have appointed liaisons to each other's studies and we are working with the Chief State School Officers Committee on Educational Information Systems and with as many state coordinators of data collection as possible. Sharing draft RFPs and serving on each other's review panels helps. There may be some point of no return, however, where taken as a whole within legislation, there may be enough of even such a good thing as evaluation.

While coordinating data collection dominates discussions now, in three years the issue may be integrating findings. For the Congressionally mandated study, synthesizing the interpretations of over 20 projects will be a difficult task. There is no provision for anyone to integrate data, interpretations and recommendations of the NIE studies with results of the many other evaluations.

The two other Congressionally mandated studies did not attempt an integration across non-NIE evaluations. At least one instance in the compensatory education hearings illustrates the confusion possible when studies reach different conclusions. This instance dealt with

the hotly debated question of the proportion and numbers of children eligible for assistance if low income, poor achievement, or only the intersect of these was the criterion (Hearings, 1978, pp. 162-165). Some provision seems needed to assure a thoughtful, well-informed, expert analysis of conflict and congruence in study findings. Probably a third party not directly responsible for conducting any of the studies such as the Congressional Budget Office or the Congressional Research Service, should be mandated (and funded) to undertake such analysis in time for the reauthorization hearings.

Holding A Steady Course in Unsteady Waters: Evaluation is a slow enterprise. The pace of design, measurement, data collection and analysis is deliberate and a study can not easily be directed toward a new port in mid-course. Yet national-level forces require considerable tacking as winds shift and waters flow.

As one example, court-ordered bussing to achieve desegregation can change class and staff composition from one year to the next and even within years, affecting ability to disentangle effects of curricula within classes from other influences, some of which may augment the curriculum's effects and some of which may be disruptive. In Follow Through, the almost continued shifting of principals, staff and students to achieve desegregation seems likely to have been accountable for some of the site-to-site variation, yet this was not systematically examined in the Follow Through evaluation.

Turning to the vocational education study, the decision to centralize the functions of the USOE regional offices may affect very seriously capability to perform the Federal administrative functions required by the 1976 Amendments. This reorganization already has coincided with the need to review and provide technical assistance to the more than 50 states in their five year plans, a demand that is less than perfectly met by regional staffs in transition and in some panic. Effects on timelines and throughness of the reviews may be expected. The result, from a research perspective, may confound a possibly excellent planning process in the 1976 Amendments with a major reorganization. The over 12 months' delay in appointing a Deputy Commissioner for the Bureau of Occupational and Adult Education may also have profound influences on implementation of the 1976 Amendments in ways that confound this hiatus in leadership with the new provisions to improve planning and administration. The decisions that threatened to eliminate appropriation requests in FY 1979 for Consumer and Homemaking Education may have influenced how Federal, state and local C&HE staff spent their energy in the past few months, and also have had consequences throughout the C&HE system in allocation of time in responding to constituency concerns versus time for new leadership.

The challenges these secular changes pose to evaluation of the Legislative Word is not antiseptic protection of a program from the real world in which it is being studied. The challenge is being sensitive enough, being able to respond fast enough to recognize and document these influences, and to negotiate changes in the study wisely enough that the results accurately reflect the multiple influences on implementation of the vocational education programs.

Heisenberg, the Witch Doctor. A Congressionally mandated study by its very existence may stimulate program change. A GAO audit or a mandated study is seen in the field as an indicator of Congressional intent to take action based on the study findings, more so than most evaluations.

The initial response of the vocational education field was negative toward having a study at all, toward NIE as the responsible agency and toward its assignment to the Education and Work Group. It was feared that the NIE was biased against vocational education (because NIE had funded the Wilms' study which was most unpopular among vocational educators; 1975) and was too ignorant of the history of the program to design and conduct an adequate study (because no one in EWG had been a vocational educator and because NIE was incorrectly perceived as not having funded vocational education research; Stevenson, 1974 v. Stump; 1975). The result, it was predicted, would be a waste of millions of dollars on useless, biased, inadequate data that more knowledgable people would then have to go to the trouble of refuting. Vocational educators fought, furiously, to delete the NIE study from the 1976 Act.

Over the past months, vocational educators seem to have focussed on the need to get the job done with regard to implementing the 1976 Amendments, using the resources of the profession to carry out the many parts of this new legislation as rapidly and adequately as possible. The evaluations may be regarded still as time-bombs that may need political action to defuse, but the fact that there will be so many independent reports on the 1976 Act seems now to be part of the motor driving the changes themselves. "The goblins are going to get you if you don't watch out" may inspire a certain amount of watching out to see if the goblins are gaining, but it may also inspire additional effort to assure the programs generally could meet the standards of excellence of a reasonable evaluation. To the extent that the Congressionally mandated studies are part of this stimulus, their conduct will confound other provisions in the 1976 Amendments to achieve compliance with the intent of Congress with the process of being evaluated. While it isn't clear whether the new Congressionally mandated studies generate more energy directed toward achieving the intent of legislation or more energy directed to evading evaluations, my impression leans toward the former. As a consequence, the study will have to be self-conscious in documenting the influence of its existence on the variables being studied, in addition to studying the effects of other provisions.

The Big Bang Theory: The new Congressionally mandated studies bring together a fairly large team directed to one purpose and with a better defined production function than most research administration provides. The rewards as well as the risks are clearer for the researchers. The team is a one-time group which need not expend energies on protecting its turf in the annual budget cycle. Because of the excitement of a Congressional study, and the great support of members of Congress and their staffs in indicating that these studies are intended for use, a good team can be attracted. Working on a moderately long-term basis on a project likely to make a national difference, seems more efficient than the usual evaluation administration in a bureaucracy. In the usual pattern, an evaluation project officer is responsible for several disparate studies at one time. The use of these studies is uncertain, and, because the studies are often smaller, a cohesive team is not formed. The loyalty of the project officer is more toward the bureaucratic unit, which spends considerable annual energy on annual planning in order to survive. In the new Congressionally mandated studies, the loyalties are to Congress and to the study itself. It is also more rewarding professionally to plan an evaluation program of related studies which together can answer questions of national interest, in contrast to one-contract-at-a-time assignments.

The success of the Compensatory Education Study and the professional rewards already gained by members of the study team adds to morale on the new studies. There is belief in the potential of this form and enthusiasm for being among the first by whom the new is tried. The anomaly of such a team within the often powerful national agency structure seems to be of advantage to study conceptualization, internal management, and use of data from many sources to inform the evaluation questions.

The Medium is Partly the Message: A third opportunity which seems to be a characteristic of the new Congressionally mandated studies is that the process of conducting the study becomes part of the results for the Congressional committees and for the evaluators, as well as for the field. Being in closer contact than usual with the scores of decisions entering into an evaluation, with the choices among alternate ways of stating the research questions and of obtaining information can help Congressional committees become more informed consumers of evaluations. There may be fewer over-expectations of what evaluations can accomplish and less under-estimation of the certainty of conclusions.

For the evaluators, contact with Congressional staff and the opportunity to see how reports from the earlier Congressionally mandated studies have been used permit a less ivied tower attitude, influencing in both direct and more subtle ways all aspects of the studies. The

evaluators develop a third ear for what might or might not be useful to Congress, how the questions can be phrased, and how the findings communicated. As the Hearings (1978) suggest, the evaluators are better prepared to communicate with Congress and to handle questions such as whether Title I is serving more non-poor than poor children. While the evaluations can not be directed from day-to-day by Congress without losing their objectivity, through communication and negotiation, sensitivities develop that influence the credibility of the findings, a factor that may be the most influential of all in determining utilization.

In Conclusion: Looking at experience to date, it is perhaps too soon to say whether the features that contributed to the positive reception of the Compensatory Education Study reports are repeatable, or even to be sure which features were new and essential. Perhaps it was due to a one time happy coincidence of a remarkably skilled Project Director, Paul Hill; an outstanding team; an appropriately mandated study funded with enough money for a long enough time to be achievable; and a period within the Executive Branch of something like benign neglect. The Vocational Education Study has been managed differently, and it is not clear if study features are reproducible in whole or in part (e.g., the negotiated design aspects) under a wider variety of circumstances, or how many constellations of approaches within the boundaries of the mandated study model may be successful.

For an approach so widely used, there seems to be remarkably little research on Congressionally mandated studies, either new or old, and very little feedback from the study teams to help Congress write mandated studies likely to achieve what Congress has most wanted. Lacking such analyses, there are reasons for caution in endorsing all or some of the features of the new Congressionally mandated studies as a better route to evaluation utilization.

At least this is the cautious perspective of an evaluation researcher. As a member of the study team, I am heartily enthusiastic about our vocational education study and about its progress to date. I am also looking forward to at least two other meetings with AERA a few years from today, and the vocational education community. The first might present the findings of the study and how they have been used in the 1982 re-authorization hearings. And the second would describe how the vocational education study procedures have themselves expanded the development of a new species of evaluations: Congressionally mandated studies that are both useful and used.

(See Weiss, 1970, however, for an exceptionally illuminating case study of Federal Student loan programs.)